

P O R T E R | S C O T T

A PROFESSIONAL CORPORATION

David R. Norton, SBN 291448

Safi U. Henson, SBN 342115

350 University Avenue, Suite 200

Sacramento, California 95825

TEL: 916.929.1481

FAX: 916.927.3706

EMAIL: dnorton@porterscott.com

shenson@porterscott.com

Attorneys for Defendants, ERIC CLAY, KEITH CURL, KEVIN HALE, and COUNTY OF TEHAMA (also erroneously sued as TEHAMA COUNTY DISTRICT ATTORNEY'S OFFICE, TEHAMA COUNTY DISTRICT ATTORNEY BUREAU OF INVESTIGATION, TEHAMA COUNTY CODE ENFORCEMENT, TEHAMA COUNTY DEPARTMENT OF PLANNING, and TEHAMA COUNTY DEPARTMENT OF BUILDING AND SAFETY)

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA**

DONNA MARIE WILL,

Case No.: 2:20-cv-01529-KJM-AC

Plaintiff,

**JOINT STIPULATION TO MODIFY
PRE-TRIAL SCHEDULING ORDER
AND [PROPOSED] ORDER**

v.

ERIC CLAY, KEITH CURL, KEVIN HALE,
COUNTY OF TEHAMA, TEHAMA
COUNTY DISTRICT ATTORNEY'S
OFFICE, TEHAMA COUNTY DISTRICT
ATTORNEY BUREAU OF
INVESTIGATION, TEHAMA COUNTY
CODE ENFORCEMENT, TEHAMA
COUNTY DEPARTMENT OF PLANNING,
TEHAMA COUNTY DEPARTMENT OF
BUILDING AND SAFETY, and DOES 1-50

Complaint Filed: 07/30/2020

Defendants.

This Stipulation is entered into by and between Plaintiff DONNA MARIE WILL ("Plaintiff") and Defendants ERIC CLAY, KEITH CURL, KEVIN HALE, and COUNTY OF TEHAMA ("Defendants") (collectively, "The Parties") by and through their respective counsel. The Parties enter into this stipulation and proposed order in compliance with the Federal Rule of Civil Procedure 16(b) and the requirements of

1 the scheduling order. The parties request to briefly continue the non-expert discovery deadline specifically
2 as it pertains to Plaintiff's responses to the following outstanding discovery requests: Defendant County of
3 Tehama's Requests for Production of Documents, Set Three; Defendant Eric Clay's Interrogatories, Set
4 Three; and Defendant County of Tehama's Interrogatories, Set Two ("Outstanding Discovery").

5 WHEREAS, this case does not currently have a trial date;

6 WHEREAS, the non-expert discovery cutoff is currently October 4, 2022. This date is also the last
7 day to hear non-expert discovery motions;

8 WHEREAS, the parties have diligently conducted discovery, including the exchange of written
9 discovery;

10 WHEREAS, Defendants served Plaintiff with the Outstanding Discovery on August 31, 2022.
11 Responses to the Outstanding Discovery are due on October 3, 2022;

12 WHEREAS, on September 29, 2022, Plaintiff's counsel requested a 30-day extension to allow
13 Plaintiff more time to gather documents and information. A 30-day extension would put the deadline to
14 respond to the Outstanding Discovery past the non-expert discovery cutoff and past the last day to hear
15 non-expert discovery motions;

16 WHEREAS, the Parties wish to extend the non-expert discovery deadline and the last day to hear
17 non-expert discovery motions only as it pertains to the Outstanding Discovery. The Parties do not wish to
18 make any other modifications to the Pre-Trial Scheduling Order at this time;

19 WHEREAS, the Parties have conferred and propose the following scheduling amendments:

- 20 • Last day for Plaintiff to provide written responses and documents in response to the
21 Outstanding Discovery: November 2, 2022
- 22 • Last day to hear motions regarding non-expert discovery related to the Outstanding
23 Discovery: November 17, 2022

24 Good cause exists for a brief, narrowly tailored continuance of the above deadlines to allow the
25 parties sufficient time to complete written discovery. Thus, the parties are requesting a continuance of the
26 non-expert discovery deadlines as it pertains to the Outstanding Discovery as stated above.

27 ///

28 ///

IT IS SO STIPULATED.

Date: October 6, 2022

PORTER | SCOTT

A PROFESSIONAL CORPORATION

By /s/ David R. Norton

David R. Norton

Safi U. Henson

Attorneys for Defendants

Date: October 6, 2022

Law Office of E. D. Lerman

By /s/ Editte D. Lerman (as approved on 9/29/22)

Editte D. Lerman

Attorney for Plaintiff

ORDER

Based upon the Stipulation of the parties, the current scheduling order is modified as set forth above.

IT IS SO ORDERED.

DATED: October 6, 2022



ALLISON CLAIRE

UNITED STATES MAGISTRATE JUDGE